

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
PATELUNAS TO INTERROGATORY OF THE OFFICE OF THE CONSUMER
ADVOCATE REDIRECTED FROM WITNESS LION
(OCA/USPS-T4-25)

The United States Postal Service hereby provides the revised response of witness Patelunas to the following interrogatory of the Office of the Consumer Advocate. OCA/T4-USPS-25, filed on July 25, 1997, and redirected from witness Lion.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making


Susan M. Duchek

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August 20, 1997

Answer of Richard Patelunas to the Interrogatories of
Office of the Consumer Advocate
to United States Postal Service
(Redirected from Witness Lion, USPS-T24)

Revised:
8/20/97

OCA/USPS-T24-25. Please refer to your testimony at page 20, line 7, and the following table, which shows the development of attributable costs for the "All Other" category

DETAIL FOR "ALL OTHER" CATEGORY
TYBR 98

COST SEGMENT	ACCRUED COSTS (\$1,000)	ATTRIBUTABLE TO PO BOXES (\$1,000)
	[1]	[2]
C/S 1	1,714,555 1/	\$3,183 1/
C/S 2	\$3,514,728 1/	\$7,531 1/
C/S 3	\$17,707,467 1/	\$71,527 1/
C/S 4	\$10,053 1/	\$0
C/S 6&7	\$11,987,730 1/	\$353 1/
C/S 8	\$452,791 1/	\$0
C/S 9	\$115,083 2/	\$0
C/S 10	\$3,730,577 2/	\$0
C/S 11	\$1,065,756 3/	\$0
C/S 12	\$648,559 2/	\$0
C/S 13	\$291,673 2/	\$0
C/S 14	\$4,364,702 2/	\$0
C/S 15	\$423,682 4/	\$0
C/S 16	\$2,121,647 5/	\$0
C/S 17	\$57,201 6/	\$0
C/S 18	\$4,235,424 7/	\$14,550 8/
C/S 19	\$38,973 9/	\$0
C/S 20	<u>\$3,211,638 10/</u>	<u>\$7,431 11/</u>
SUBTOTAL	\$55,692,237	\$104,575
TOTAL	ALL C/S \$60,766,222 12/	

NOTES AND SOURCES

- 1/ USPS-T-15, WP E, Table D, at 2.
- 2/ USPS-T-1 5, WP E, Table D, at 4.
- 3/ USPS-T-15, WP E, Table D, at 36.
- 4/ USPS-T-1 5, WP E, Table D, at 48.
- 5/ $\$2,121,647 = \$3,529,646 - \$1,407,999$ USPS-T-15, WP E, Table D, at 52 & 54.

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Revised:
8/20/97

6/ USPS-T-15, WP E, Table D, at 6.

7/ $\$4,235,424 = \$4,595,701 - \$360,277$ USPS-T-15, WP E, Table D, at 56 & 64.

8/ $\$14,550 = \$21,804 - \$7,254$ USPS-T-15, WP E, Table D, at 56 & 64.

9/ USPS-T-15, WP E, Table D, at 8

10/ $\$3,211,638 = \$4,155,532 - (\$581,680 + \$362,214)$

USPS-T-15, WP E, Table C, at 32, and Table D, at 66 & 68

11/ USPS-T-15, WP E, Table C, at 32.

12/ USPS-T-15, WP E, Table D, at 8.

- a. Please confirm that the figures in column [1] are correct. If you do not confirm, please explain and provide the correct figures. Please show all calculations and provide citations to any figures used.
- b. Please confirm that the figures in column [2] are correct. If you do not confirm, please explain and provide the correct figures. Please show all calculations and provide citations to any figures used.
- c. Please refer to the "Notes and Sources." Please confirm that the citations, and calculation of figures based upon those citations, in the "Notes and Sources" accompanying the table above are correct. If you do not confirm, please explain and provide the correct citations and figures. Please show all calculations and provide citations to any figures used.

OCA/USPS-T24-25 Response:

- a. Part a is confirmed.
- b. Part b is confirmed.
- c. Part c is confirmed.

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief

A handwritten signature in cursive script, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 8/20/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Susan M. Duchek

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